

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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In re:	:	Chapter 11
	:	
FTX TRADING LTD., <i>et al.</i> , ¹	:	Case No. 22-11068 (KBO)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----	X	Re. D.I. 28586

**CERTIFICATION OF COUNSEL REGARDING THE JOINT LIQUIDATORS OF
THREE ARROWS CAPITAL, LTD.’S MOTION FOR LEAVE TO DEPOSE THE
INCARCERATED INDIVIDUALS PURSUANT TO FED. R. CIV. P. 30(a)(2)**

The undersigned counsel to Russell Crumpler and Christopher Farmer, in their joint capacities as the duly authorized joint liquidators (the “Joint Liquidators”) appointed in the British Virgin Islands’ liquidation of Three Arrows Capital, Ltd. (in liquidation) (the “3AC Debtor”) and foreign representatives of the 3AC Debtor, as recognized pursuant to chapter 15 of the Bankruptcy Code in the case captioned *In re Three Arrows Capital, Ltd.*, Case No. 22-10920 (MG) (Bankr. S.D.N.Y. 2022), hereby certifies as follows:

1. On November 6, 2024, the Joint Liquidators filed a sealed version of the *Motion of the Joint Liquidators of Three Arrows Capital, Ltd. (in Liquidation) for Leave to Amend Proof of Claim* [D.I. 27755] (the “Motion to Amend the POC”).
2. On December 5, 2024, the Joint Liquidators filed the *Motion for Leave to Depose the Incarcerated Individuals Pursuant to Fed. R. Civ. P. 30(a)(2)* [D.I. 28586] (the “Motion to Depose”).

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the FTX Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the FTX Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

3. This Court heard the oral argument related to the Motion to Amend the POC on December 12, 2024, and took the matter under advisement.

4. Pursuant to the Notice of Motion to Depose, objections or responses to the Motion to Depose were to be filed and served no later than December 19, 2024, at 4:00 p.m. (ET). *See* D.I. 28586-1.

5. Prior to the foregoing objection deadline, the only objecting parties at the time were the Debtors, which filed a limited objection on the asserted grounds that “the discovery sought by the Motion [to Depose] would be premature while the 3AC Motion to Amend [the POC] remains pending.” *See* D.I. 28915.

6. The Joint Liquidators subsequently agreed to adjourn the Motion to Depose until the Court decided the Motion to Amend the POC. *See* D.I. 29070.

7. On March 13, 2025, this Court resolved the Joint Liquidators’ Motion to Amend the POC and granted the same. *See* D.I. 29924.

8. Since the Court finally disposed of the Motion to Amend the POC, the Joint Liquidators and the FTX Recovery Trust agreed to a scheduling order relating to litigation of the FTX Recovery Trust’s Claim Objection, filed on June 20, 2025. *See* D.I. 31861 & 31880.

9. Now that the Joint Liquidators’ Motion to Amend the POC was granted and a contested matter has been created with respect thereto, the Joint Liquidators again conferred with the FTX Recovery Trust regarding its position on the relief sought in the Motion to Depose. The FTX Recovery Trust represented to the Joint Liquidators that it takes no position as to the relief sought therein.

WHEREFORE, the Joint Liquidators respectfully request that the Court, at its earliest convenience, enter the Order substantially in the form attached hereto as **Exhibit A**, which permits the Joint Liquidators to serve the updated deposition subpoenas attached hereto as **Exhibit B**.

Dated: August 26, 2025
Wilmington, Delaware

PASHMAN STEIN WALDER HAYDEN, P.C.

/s/ Alexis R. Gambale

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